

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TONY KHOURY, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

FXCM INC., DROR NIV, and ROBERT
LANDE,

Defendants.

Case No. 1:17-cv-00916-RA

YING ZHAO, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

FXCM INC., DROR NIV, and ROBERT
LANDE,

Defendants.

Case No. 1:17-cv-00955-UA

DAVID BLINN, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

FXCM INC., DROR NIV, and ROBERT
LANDE,

Defendants.

Case No. 1:17-cv-01028-RA

683 CAPITAL PARTNERS, L.P.,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiff,

v.

Case No. 1:17-cv-02506-UA

GLOBAL BROKERAGE, INC. f/k/a
FXCM INC., DROR NIV, and ROBERT
LANDE,

Defendants.

**DECLARATION OF LESLEY F. PORTNOY IN SUPPORT OF THOMAS KELLY'S
MOTION FOR CONSOLIDATION OF RELATED ACTIONS, APPOINTMENT AS
LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

I, Lesley F. Portnoy, hereby declare as follows:

1. I am an attorney with the law firm Glancy Prongay & Murray LLP, proposed lead counsel for lead plaintiff movant Thomas Kelly (“Movant”) and proposed lead counsel for the Class.

2. I submit this Declaration, together with the attached exhibits, in support of Movant’s motion for appointment as lead plaintiff and approval of his selection of Glancy Prongay & Murray LLP and Bragar Eagle & Squire P.C. as Co-Lead Counsel for the Class.

3. Attached hereto as the exhibits indicated are true and correct copies of the following:

Exhibit A: Press release published February 7, 2017 on *Business Wire*, announcing the pendency of the securities class action against defendants herein: *Tony Khoury v. FXCM Inc., et al.*, Case No. 1:17-cv-00916-RA.

Exhibit B: Certifications of Movant.

Exhibit C: Chart detailing financial losses of Movant.

Exhibit D: Firm résumé of Glancy Prongay & Murray LLP.

Exhibit E: Firm résumé of Bragar Eagle & Squire P.C.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct. Executed this 10th day of April, 2017 at Los Angeles, California.

s/ Lesley F. Portnoy
Lesley F. Portnoy

**PROOF OF SERVICE BY ELECTRONIC POSTING PURSUANT TO SOUTHERN
DISTRICT OF NEW YORK ECF AND LOCAL RULES AND BY MAIL
ON ALL KNOWN NON-REGISTERED PARTIES**

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On April 10, 2017, I served true and correct copies of **DECLARATION OF LESLEY F. PORTNOY IN SUPPORT OF THOMAS KELLY'S MOTION FOR CONSOLIDATION OF RELATED ACTIONS, FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 10, 2017 at Los Angeles, California.

s/ Lesley F. Portnoy
Lesley F. Portnoy

Mailing Information for a Case 1:17-cv-00916-RA Khoury et al v. FXCM Inc. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Israel Dahan**
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- **Matthew Moylan Guiney**
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- **Phillip C. Kim**
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- **Roger Alan Sachar , Jr**
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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)